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January 26, 2011

### VIA ECF

Honorable James S. Gwin  
United States District Court  
Carl B. Stokes United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113-1838

Re: *Melinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon Redner, and Thomas J. Smith, v. Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger*  
Docket No. 06 CV 1625 (JSG)

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Honorable Sir:

As you know, we represent the defendants in the above action. We write to request a two week extension of our time to submit opposition to Plaintiff's fee request. Our opposition is currently due on January 28<sup>th</sup>. We therefore request that the briefing schedule be modified to permit our opposition to be filed on February 11<sup>th</sup>, and for Plaintiffs' Reply to be filed on February 25<sup>th</sup>. Previously, Plaintiffs were granted a two week extension of time to file their application, which is voluminous. Defendants have not previously requested an extension of time to submit their opposition. Earlier today, Mr. Chittur submitted a letter to Your Honor in which he opposes our application, and in which he also addresses the current impasse over the execution of a Settlement Agreement.

We will not burden the Court further with a response to Mr. Chittur's arguments concerning the settlement, as we believe that those issues have already been fully addressed with Your Honor. As stated in my last letter to Your Honor, Defendants are prepared to comply with the terms of the Settlement Agreement once it is fully executed. We believe that Plaintiff's attorneys are responsible for the delays in finalizing the settlement.

Respectfully submitted,

/s/

Robert D. Lillienstein

cc. Krishnan Chittur, Esq. (via ECF)  
Keith Altman, Esq. (via ECF)